<div align="center">**REMARKS**</div>

I.   Status of the Application

A non-final Office Action was mailed on January 17, 2007.

Claims 1, 7, 8, 98, 111, 112, 115, 118, 131, 141, 143, 144, 146, 147, 155, 170, 171, 176 - 178, 186, 190, 192 - 194, 202, 203, and 216 - 220 are currently pending. Applicants amend claims 155 and 176 as to informalities. No new matter is added.

II.   Claim Rejections under 35 U.S.C. § 112

Claims 1, 7, 8, 98, 111, 112, 115, 118, 131, 141, 143, 144, 146, 147, 155, 170, 171, 176 - 178, 186, 190, 192 - 194, 202, 203, and 216 - 220 are rejected under the first paragraph of 35 U.S.C. § 112 for failing to comply with the written description requirement. Specifically, the Examiner finds that amendments previously made to claims 1, 141, 155, 176, 186, 192, 194 and 216 recited features not set forth in the original specification. Applicants respectfully traverse this rejection.

As to claim 1, the Examiner finds the following claim language to be unsupported by the specification:

> the first expert with access to the at least one first question and the at least one second question upon generation of the personal expert interface, wherein the personal expert interface presents the at least one first question in a first grouping of questions directed to the first expert, and presents the at least one second question in a second grouping of questions directed either to the plurality of experts serving the forum, or directed to the first expert by the at least other expert in the plurality of experts

Applicants respectfully submit that adequate support for this claim language may be found, for example, with reference to the third paragraph beginning on page 8 of the specification and to FIG. 7.

As explained in the third paragraph beginning on page 8 of the specification, questions may be a) specifically directed to an expert ("the first expert"), b) posted to a forum with no specific expert selected (i.e., "directed to the plurality of experts serving the forum"), or c) referred to the first expert by another expert ("the at least other expert). As illustrated in FIG. 7, the personal expert interface consolidates category a) questions to be retrieved by selecting a "For Me" button, consolidates category b) questions to be retrieved by selecting a "General" button, and consolidates category c) questions to be retrieved by selecting a "Refer" button. On at least this basis, Applicants submit that the referenced language of amended claim 1 is adequately supported.

As to claim 141, the Examiner finds the following claim language to be unsupported by the specification:

> a second group of questions directed to the first expert by others of the plurality
> of experts on referral

As described above with reference to claim 1, the third paragraph of page 8 of the specification and FIG. 7 illustrates a personal expert interface page presenting a first grouping of questions specifically directed to the first expert and another grouping of question referred to the first expert by another expert. The personal expert interface presents the first grouping for retrieval by selecting a "For Me" button, and presents the other grouping ("the second grouping") for retrieval by selecting a "Refer" button. On at least this basis, Applicants submit that the referenced language of amended claim 141 is adequately supported.

As to claim 155, the Examiner finds the following claim language to be unsupported by the specification:

> a command from the expert via the personal expert interface of the one expert …
> [including] a private message"

Applicants respectfully submit that adequate support for this claim language may be found, for example, by referral to FIGs. 5 and 6A.

FIG. 6A presents a flow chart that illustrates how an expert may use the personal expert interface. Upon selecting a question to be answered, the expert may choose to engage in one of a

number of different actions, including a referral of the question (i.e., by selecting the "Refer Question" page of the personal expert interface of FIG. 6A). As described in FIG. 6A, the Refer Question page includes "an editible text box for inserting a private message to accompany referral." As illustrated for example in FIG. 5, the referral and private message are transmitted by the expert via the personal expert interface as a "command." On at least this basis, Applicants submit that the referenced language of amended claim 155 is adequately supported.

As to claim 176, the Examiner finds the following claim language to be unsupported by the specification:

> a server [] presenting questions of a predetermined subject matter that are submitted by at least one of a plurality of users

Applicants respectfully submit that adequate support for this claim language may be found, for example, in the second paragraph of page 6.

he second paragraph of page 6 discloses that:

> the user is presented with a Q&A forum page, which offers a choice of fora, including: treatment, fatigue, oral health, infection, safe sex, viral load, mental health, mixed couples, spiritual and workplace. Once the user selects a forum, a forum page gives the user several options, including ask a question ...

Thus, by selecting a choice of forum, a user may submit questions of a "predetermined subject matter" (for example, relating to mental health or to workplace) On at least this basis, Applicants submit that the referenced language of amended claim 176 is adequately supported.

As to claim 186, the Examiner finds the following claim language to be unsupported by the specification:

> receiving a second question via another one of the plurality of client interfaces identified as another forum; and [] routing the second question to the one expert [who has also received a question submitted by a first one of the client interfaces identified as a forum]

Applicants respectfully submit that adequate support for this claim language may be found, for example, in FIG. 6A.

FIG. 6A describes a "Top Level" page for the expert's personal expert interface as listing titles and dates of all questions asked of experts, and that this information is then "further divided into Forums." Thus, as the expert's personal expert interface is capable of displaying questions submitted from more than one forum (i.e., such as a "first forum" and "another forum"), it must clearly also be capable of "receiving" question from each of the first forum and the other forum. On at least this basis, Applicants submit that the referenced language of amended claim 186 is adequately supported.

As to claim 192, the Examiner finds the following claim language to be unsupported by the specification:

> the server receiving a second command from the other expert, the second command including at least one answer to the question

Applicants respectfully submit that adequate support for this claim language may be found, for example, in the third paragraph beginning on page 9 and in FIGs. 5 and 9.

In describing FIG. 9, the third paragraph beginning on page 9 discloses that:

> [once] the expert has completed the chosen task or tasks, he or she exits by specifying that the results be posted. The system then examines whether there was a referral or not (step 912) and whether there was any answer … Depending on what combination it finds, it determines that it should … simply post the question and answer

As illustrated for example in FIG. 5, the posting by the expert is transmitted to the system as a "command." On at least this basis, Applicants submit that the referenced language of amended claim 192 is adequately supported.

As to claim 194, the Examiner finds the following claim language to be unsupported by the specification:

> a first one of the at least two commands includes a first answer to a first one of the questions submitted from one of the at least two forums and a first instruction instructing the server to post the first answer, and the second one of the at least two commands includes a second answer to a second one of the questions

submitted from another one of the at least two forums and a second instruction
instructing the server to post the second answer

Applicants respectfully submit that adequate support for this claim language may be found, for example, in the first paragraph of page 8 and in FIGs. 5, 6A, and B.

As described in the first paragraph on page 8, FIGs. 6A and 6B show that an expert may use a post command to post an answer to a selected question to a selected forum. In addition, FIGs. 6A and 6B indicates that questions are grouped for an expert by forum, thereby indicating that an expert can select and post answers to questions submitted from more than one forum. As illustrated for example in FIG. 5, answers are posted by the expert to the server by transmission of a "command." On at least this basis, Applicants submit that the referenced language of amended claim 194 is adequately supported.

As to claim 216, the Examiner finds the following claim language to be unsupported by the specification:

the server generating at least two forums; ... wherein the instruction instructs the
server to post the answer to the first forum accessed by the user to present the
question and to at least a second one of the at least two forums, at which the
question was not presented by the user

Applicants respectfully submit that adequate support for this claim language may be found, for example, in the first paragraph of page 8 and in FIGs. 6A and B.

As described in the first paragraph on page 8, FIGs. 6A and 6B illustrate that an expert can prepare to post an answer to the forum at which the question was presented (e.g., via the "Answer Question" page), and can prepare to post the answer to another forum other than the presenting forum (via the "Cross Post" page). As indicated in the first paragraph of page 8,

"[upon] completing the chosen tasks [i.e., indicating that the answer should be
posted to the forum presenting the question and cross-posted to the other forum],
the expert chooses [ ] post [ ]. The post command prompts the expert to verify the
results and then the question is posted to the appropriate forum."

FIGs. 6A and 6B further illustrate that, upon execution of the post command, the expert is presented with a "Verify Page" that "lists the Forum(s) ... that the Q&A is being posted to." On at least this basis, Applicants submit that the referenced language of amended claim 1 is adequately supported.

Accordingly, Applicants respectfully submit that adequate support exists within the specification for each of the amendments previously made to claims 1, 141, 155, 176, 186, 192, 194 and 216, and therefore request that the rejections under the first paragraph of 35 U.S.C. § 112 of 1, 7, 8, 98, 111, 112, 115, 118, 131, 141, 143, 144, 146, 147, 155, 170, 171, 176 - 178, 186, 190, 192 - 194, 202, 203, and 216 - 220 be withdrawn.

III.   Claim Rejections under 35 U.S.C. § 103

Claims 98, 111, 112, 115, 118 and 131/220[1] are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S.. Patent No. 6,026,148 to Dworkin et al. ("Dworkin") in view of U.S. Patent No. 5,819,267 to Uyama and U.S. Patent No. 5,880,731 to Liles et al. ("Liles"). Applicants respectfully traverse this rejection. In current independent claim 98, Applicants disclose:

> **98.** A system executed by a server for providing a plurality of answers from an expert to a plurality of questions posed by a plurality of users, the users communicating with the server via a plurality of client interfaces, each of the client interfaces being identified to the users as a forum on a predetermined subject matter of the forum and as presenting the expert as an expert on the subject matter, the system comprising:
>
> a question receiving component configured to receive one of the plurality of questions at the server, the one question being directed to the expert from a user via one of the client interfaces;
>
> a routing component configured to display the received question with other questions directed to the expert on a personal expert interface, wherein the personal expert interface is uniquely associated with the expert;

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[1] Claim 98 is independent, and claims 111, 112, 115, 118 and 220 depend from independent claim 98. Claim 131 depends from independent claim 176. Applicants presume that this rejection is _not_ intended to apply to claim 131, and is instead intended to apply to claim 220.

a command receiving and executing component configured to receive one or more commands from the expert together with an answer to the question, and to post the answer to the question, wherein the one or more commands provide that the answer to the question will be posted in two or more of the plurality of forums.

The Examiner asserts that Dworkin discloses a system for providing answers to questions that, by virtue of being administered via a web site having a number of linked web pages, provides "a plurality of client interfaces [ ] each [ ] identified to the users as a forum on a predetermined subject matter of the forum" In combination with Uyama and Liles, the Examiner finds that Dworkin suggests Applicants' claimed command receiving and executing component for posting an answer to a question "in two or more of the plurality of forums."

Applicants respectfully disagree with the Examiner's assertions, and repeat previously-made arguments in this regard.[2]:

> … Dworkin discloses a system that allows users to submit questions to be answered by an expert, and allows the expert to post answers to these questions. Unlike Applicant's claimed invention, however, the system of Dworkin corresponds to a single forum as defined by Applicant ("enabling users to present questions and to view questions and answers relating to the predetermined subject matter"), and fails to teach or suggest the elements of Applicants' claimed invention that provide for the posting of answers to two or more different forums. In addition, none of the other cited references teach or suggest this claimed feature.
>
> The Examiner asserts that Dworkin does in fact teaches a method allowing users to submit questions to an expert via different forums, suggesting that each distinct web page in Dworkin's system (for example, as illustrated by Dworkin's FIGs. 7, 8 and 9) constitutes a distinct forum. As this position is at odds with both Applicants' and Dworkin's disclosed definitions for forums, Applicants respectfully disagree.
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> Applicants define a forum as a device "enabling users to present questions and to view questions and answers relating to [a] predetermined subject matter of the forum." (see, e.g., Applicants' claim 1). Similarly, Dworkin compares a forum to

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[2] See, e.g., Applicants' Preliminary Amendment of September 25, 2006 for the present application

a "computerized bulletin board [], in which users post technical questions, and in which those questions may be answered by one or more expert respondents, and/or by other users." (see, e.g., Col. 3: 3 - 7 of Dworkin). With reference to FIG. 3, Dworkin illustrates a "Medical Expert's Group Forum" providing expert information relating to for example the medical field. This example by Dworkin is clearly congruent with Applicants' definition of a forum.

In sharp contrast to Applicants' invention as claimed in amended independent claim 98, Dworkin nowhere discloses or suggests a system in which the expert is provided with a personal expert interface that facilitates communication with more than one forum. For example, the web pages illustrated by FIGs. 8 and 9 of Dworkin are each accessed from the web page of FIG. 7, which includes a button for returning to the "forum home page." Clearly, according to each of Applicants' and Dworkin's apparent definitions, all of the web pages illustrated by FIGs. 7 -9 are in fact part of a single forum.

As argued, Applicants respectfully submit that Dworkin fails to teach or otherwise suggest a system permitting communication between experts and users that communicate with the experts via a plurality of distinct client interfaces each identified to users as a forum on a predetermined subject matter of the forum. Applicants further submit that, even with the addition of Uyama and/or Liles in combination with Dworkin, the combination still fails to teach or suggest such a system, and in particular, Applicants claimed command receiving and executing component configured to receive commands from the expert for posting an answer from the expert in two or more of the plurality of forums.

Uyama discloses a know-how management apparatus that enables a user who is dissatisfied with information provided by an article in a knowledge base to identify an expert consultant for additional assistance, and to transmit a question requesting additional assistance to the consultant (see, e.g., abstract of Uyama). Uyama's apparatus includes a questioning/answering means by which expert consultants can retrieve questions that are specifically directed to them by users, and a virtual package browsing means providing an interface between the apparatus and the user for receiving answers to the questions (see, e.g., Col. 12: 37 - 46 of Uyama). Uyama however fails to describe multiple user forums each having a distinct client interface identified to users as a forum on a predetermined

subject matter of the forum, and neither discloses nor suggests that the know-how management apparatus provides means for consultants to <u>post answers to questions in two or more of a plurality of forums</u>.

Liles discloses a method for providing an on-line chat session in which participants are able to be graphically represented by means of avatars (see, e.g., abstract and Col. 1: 23 - 25 of Liles). Comments made by users may be displayed in one or more panes that are visible to the participants on their computer screens (see, e.g., Col. 1: 29 - 32). Like Uyama and Dworkin, however, Liles fails to describe <u>multiple user forums</u> for participants that each have a distinct client interface identified to users as a forum on a predetermined subject matter of the forum. In addition, Liles fails to disclose or suggest any capability for participants to <u>post answers to questions in two or more of a plurality of forums</u>.

For at least these reasons, Applicants respectfully submit that independent claim 98 is not made obvious by the combination of Dworkin, Uyama and Liles, and therefore stands in condition for allowance. As claims 11, 112, 115, 118 and 220 depend from allowable independent claim 98, Applicants further submit that dependent claims 11, 112, 115, 118 and 220 are also allowable for at least this reason.[3]

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[3] As previously noted, Applicants presume that the rejection of claim 131 under 35 U.S.C. § 103(a) in the Office Action of January 17, 2007 was made in error.

CONCLUSION

Therefore, in view of the above amendments and remarks, it is respectfully requested that a Notice of Allowance as to all pending claims be issued in this case.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

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